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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 MICHAEL CAPLAN, individually and
9 on behalf of all others similarly situated,

10 *Plaintiff,*

11 v.

12 BUDGET VAN LINES, INC., a New York
13 corporation,

14 *Defendant.*

Case No. 2:20-cv-00130-JCM-VCF

**STIPULATION TO EXTEND
DEADLINES TO RESPOND TO
DEFENDANT'S MOTIONS**

(First Request)

16 Plaintiff Michael Caplan and Defendant Budget Van Lines hereby stipulate and agree as
17 follows:

18 1. On March 13, 2020, Defendant filed a motion to dismiss the class action
19 complaint [ECF No. 14] and a motion to strike class allegations from the complaint [ECF No.
20 15]. Plaintiff's responses to the motion to dismiss and motion to strike are due to be filed on
21 March 27, 2020, and Defendant's replies in support of the motions are due to be filed no later
22 than April 3, 2020.

23 2. On March 14, 2020, Defendant filed a motion to stay [ECF No. 16]. Plaintiff's
24 response to the motion to stay is due to be filed on March 30, 2020, and Defendant's reply in
25 support of the motion to stay is due to be filed no later than April 6, 2020.

26 3. Plaintiff and Defendant agree that Plaintiff shall have an extension of time up to
27 and including Monday, April 6, 2020, to file responses to the motion to dismiss, the motion to
28 strike, and the motion to stay, and Defendant shall have an extension of time until April 20, 2020

1 to reply in support of the motions. This is the first request for an extension of time to respond to
2 or reply in support of the motions.

3 4. The extensions are requested to account for the current extenuating circumstances
4 surrounding the Coronavirus pandemic. The requested extensions will permit the parties and
5 their counsel sufficient time to review and appropriately respond to the opposing party's
6 arguments.

7 5. The stipulated extension will not prejudice the parties, nor will it impact other
8 deadlines in this case.

9 Respectfully submitted,

10 Dated: March 26, 2020

11 /s/ Kristin E. Haule

12 Kristin E. Haule, Esq. (admitted *pro hac vice*)
13 Ca Bar # 312139
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20 *Inc.*

19 *Attorneys for Plaintiff LaDarrius Cooley*

21 IT IS SO ORDERED:

22 
23 HONORABLE JAMES C. MAHAN
24 UNITED STATES DISTRICT JUDGE

25 DATED: March 27, 2020
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